

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN (DUBUQUE) DIVISION

UNITED STATES OF AMERICA,)	No. 23-CR-1015
)	
Plaintiff,)	INFORMATION
)	
vs.)	Count 1
)	18 U.S.C. § 1343: Wire Fraud
HEATHER LEIGH MIGLIORE, also)	
known as "Heather Leigh Spears,")	
)	
Defendant.)	

The United States Attorney charges:

Count 1

Wire Fraud

Introduction

At all relevant times to this Information:

1. Defendant HEATHER LEIGH MIGLIORE was a resident of Waukon, Allamakee County, Iowa, within the Northern District of Iowa.
2. Victim-1 owned and operated a tax preparation business in the Northern District of Iowa. Victim-1 did not incorporate but instead did business under the trade name of a national tax preparation chain. Victim-1 operated branch offices for the business in both Waukon and Decorah, Winneshiek County, Iowa, within the Northern District of Iowa.
3. Defendant HEATHER LEIGH MIGLIORE worked for Victim-1 as Victim-1's office manager. As office manager, defendant had sole responsibility for Victim-1's business finances. Among other things, defendant in charge of Victim-1's

payroll at both offices. Using the Victim-1's signature stamp, defendant would write and sign paychecks for Victim-1's employees. Defendant was also responsible for paying Victim-1's bills. Victim-1 utilized business checking accounts at two financial institutions, one for each branch of the business and through which Victim-1 received revenue and made payments.

4. CU-1 is a Wisconsin credit union that operates branches throughout the Midwest, including at Decorah. Victim-1 had a business checking account ending in 688 at CU-1 for Victim-1's Decorah branch. Defendant HEATHER LEIGH MIGLIORE also maintained a personal checking account ending in 597 at CU-1.

5. Bank-1 is an Iowa bank that operates branches throughout the Northern District of Iowa, including at Waukon. Victim-1 had a business checking account ending in 164 at Bank-1 for Victim-1's Waukon branch.

The Scheme to Defraud

6. From no later than January 2015, through at least November 2021, in the Northern District of Iowa and elsewhere, defendant voluntarily and intentionally devised and executed a scheme to defraud Victim-1, and to obtain Victim-1's money and property by means of false and fraudulent pretenses, representations, and promises ("the scheme to defraud"), and participated in the scheme to defraud with knowledge of its fraudulent nature.

Manner and Means of the Scheme to Defraud

7. It was a part of the scheme to defraud that defendant HEATHER LEIGH MIGLIORE would cause Victim-1 to make payments to defendant without Victim-1's knowledge or permission. Defendant would write checks payable to herself on Victim-1's business checking accounts at CU-1 and Bank-1 and make it appear as if Victim-1 authorized the checks by using Victim-1's signature stamp without lawful authority. It was also a part of the scheme to defraud that defendant would cash the checks and deposit the proceeds of the scheme to defraud from CU-1 and Bank-1 into defendant's own account at Bank-1. Defendant would then delete the checks from Victim-1's electronic bookkeeping system so that Victim-1 would not detect the scheme to defraud. Finally, it was part of the scheme to defraud that defendant spent the transferred fraud proceeds to pay her own expenses.

Execution of the Scheme to Defraud

8. For the purpose of executing and attempting to execute the above-described scheme and artifice to defraud and to obtain property and money by means of false and fraudulent pretenses and representations, defendant HEATHER LEIGH MIGLIORE knowingly caused to be transmitted by means of wire in interstate commerce, the following writings, signs, signals, pictures, or sounds:

On or about May 3, 2019, defendant HEATHER LEIGH MIGLIORE caused an online payments system headquartered in San Jose, California, to withdraw

\$12.00 in proceeds of the scheme to defraud from her personal account at Bank-1 ending in 597.

This was in violation of Title 18, United States Code, Section 1343.

TIMOTHY T. DUAX
United States Attorney

By: /s/ *Timothy L. Vavricek*

TIMOTHY L. VAVRICEK
Assistant United States Attorney